

WILLIAM K. HARRINGTON
United States Trustee, Region 2
U.S. Department of Justice
Office of the United States Trustee
One Bowling Green, Room 534
New York, New York 10004
Telephone: (212) 510-0500
By: Daniel Rudewicz, Trial Attorney

Hearing Date: February 27, 2025
Hearing Time: 10:00 a.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

Valdesia Gardens Housing
Development Fund Corporation,

Debtors.

Chapter 11

Case No. 24-23086 (KYP)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon this Notice of Motion and the accompanying memorandum of law, William K. Harrington, the United States Trustee for Region 2 (the “United States Trustee”), will move this Court before the Honorable Kyu Young Paek, Bankruptcy Judge, in the United States Bankruptcy Court, for an order (a) appointing a chapter 11 trustee and (b) denying the entry of the *Stipulation and Order Pursuant To 11 U.S.C. § 543(d)(1) Excusing State Court Receiver From Provisions of 11 U.S.C. § 543(a) And (b) And Granting Related Relief* [ECF No. 16]; [ECF No. 20] (the “Stipulation”).

PLEASE TAKE FURTHER NOTICE, that the hearing will be held via Zoom for Government. Participants are required to register their appearance by 4:00 p.m. the day before the Hearing by utilizing the Electronic Appearance portal located on the Court’s website at <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>.

PLEASE TAKE FURTHER NOTICE that any responsive papers should be filed with the Court and personally served on the United States Trustee, at One Bowling Green, New York, New York 10004, to the attention of Daniel Rudewicz, Esq., no later than seven (7) days prior to the return date set forth above. Such papers shall conform to the Federal Rules of Civil Procedure and identify the party on whose behalf the papers are submitted, the nature of the response, and the basis for such response.

Dated: January 24, 2025
New York, New York

WILLIAM K. HARRINGTON
UNITED STATES TRUSTEE

By: /s/ Daniel Rudewicz
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